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American Chemistry Council
Good Chemistry Makes It Possible

August 21, 2003

Hand Delivered

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Office of Pollution Prevention and Toxics
U.S. Environmental Protection Agency
1201 Constitution Avenue N.W.
Washington, DC 20460-0001

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Attention: TSCA Section 8(e) Coordinator

RE: Low DCPD Resin Oil – Rat Range Finding Study

Dear Sir or Madam:

The American Chemistry Council Olefins Panel submits this letter on behalf of certain of its members[1] pursuant to Section 8(e) of the Toxic Substances Control Act (TSCA) to inform EPA of certain preliminary findings in rats exposed to Low Dicyclopentadiene Resin Oil (Low DCPD Resin Oil). The Panel has not made a determination as to whether a significant risk of injury to health or the environment is actually presented by the preliminary findings.

Low DCPD Resin Oil was tested pursuant to the Olefins Panel's test plan for the Resin Oils and Cyclodiene Concentrates Category under the High Production Volume Chemical Challenge Program.[2] The CAS Registry numbers used to identify Low DCPD Resin Oil are 68477-54-3 (Distillates, petroleum, steam-cracked, C8-12 fraction) and 68516-20-1 (Naphtha, petroleum, steam-cracked middle arom.). This stream is produced as a C8-C12 distillate of a pyrolysis gasoline stream. Low DCPD Resin Oil typically contains less than 0.5% DCPD. The primary components are vinyl aromatics.

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1 The sponsor companies are Chevron Phillips Chemical Company LP, The Dow Chemical Company, Equistar Chemicals, LP, ExxonMobil Chemical Company, The Goodyear Tire & Rubber Company, NOVA Chemicals Inc., Noveon, and Shell Chemical Company LP.

2 The test plan is available at http://www.epa.gov/chemrtk/olefins/olefintp.pdf.

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Groups of 6 time-mated female rats were administered Low DCPD Resin Oil at dosages of 0, 100, 375 or 750 mg/kg/day by gavage during days 12 – 19 of gestation. In the 750 mg/kg group animals, placental weights and combined male and female fetal weight were found to be reduced. Maternal toxicity was also evident in the dams that received 375 and 750 mg/kg day Low DCPD Resin Oil as indicated by reductions in body weight, body weight gain, and feed consumption. The final report is not yet available but will be forwarded when received from the laboratory.

If you have any questions, please contact me at 301 924 2006 or Elizabeth_Moran@americanchemistry.com.

Yours truly,

Elizabeth J. Moran, Ph.D.
Manager, Olefins Panel

cc: Richard H. Hefter (MC 7403)

DuPont Haskell Laboratory
for Health and Environmental Sciences
Elkton Road, P.O. Box 50
Newark, DE 19714-0050

August 20, 2003

Elizabeth Moran, Ph.D.
Managing Director, CHEMSTAR
American Chemistry Council
1300 Wilson Blvd.
Arlington, VA 22209

Re: Results of the Low Dicyclopentadiene Resin Oil Range-finding Study
(ACC Reference Number OLF-92.0-HPV789-DHL)

Dear Dr. Moran,

Groups of 6 time-mated female Crl:CD®(SD)IGS BR rats were administered Low Dicyclopentadiene Resin Oil (Low DCPD Resin Oil) once daily by gavage during days 12-19 of gestation (days 12-19G) at daily dosages of 0, 100, 375 or 750 mg/kg/day. During the in-life portion of the study, maternal body weights, food consumption, and clinical signs data were collected. On day 20G, all dams were euthanized and examined grossly. Gravid and empty uterine weights were recorded to permit calculation of the adjusted maternal final body weight. The uterine contents were examined and described; fetuses and placentas were weighed; and fetuses were sexed and examined for any external alterations.

Dose-related reductions in maternal body weight, body weight gain, and food consumption occurred in rats administered 375 or 750 mg/kg/day. Maternal animals in the 750 mg/kg/day group had increased incidences salivation, and wet and/or stained fur. Placental weight was reduced in rats administered 750 mg/kg/day. There were no test substance-related gross post-mortem observations in animals administered any dosage of Low DCPD Resin Oil.

There were no effects on number of litters produced, early or late resorptions, implantations, corpora lutea, live fetuses, or dead fetuses in any dosage group.

Combined male and female fetal weight was reduced in the 750 mg/kg/day group. There were no test substance-related fetal external malformations or variations observed in any dose group.

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Parameter	0 mg/kg/day	100 mg/kg/day	375 mg/kg/day	750 mg/kg/day
Maternal body weight GD20	411.2	406.3	381.3	382.6
Corrected maternal body weight GD20 (g) (w/o products of conception)	347.3	334.2	317.9	316.2
Maternal body weight gain GD12-20 (g)	92.9	87.1	67.4	64.2
Corrected maternal body weight gain GD 12-20 (g) (w/o products of conception)	29.1	15.0	4.1	-2.2
Maternal food consumption GD12-20 (g)	27.8	25.7	23.9	23.2
Number pregnant	6/6	6/6	6/6	6/6
Implantations	12.5	13.5	11.8	14.8
Mean placental weight (g)	0.5042	0.5188	0.5084	0.3917
Mean early resorptions	0.5	0.2	0.0	0.7
Mean late resorptions	0	0	0	0
Corpora lutea	15.3	14.2	13.0	17.2
Fetal weight (g)	3.81	3.75	3.81	3.43
Live fetuses	12.0	13.3	11.8	14.2
Dead fetuses	0	0	0	0
Fetal external malformations/variations (no. affected fetuses)	0	0	0	0

Sincerely,

Linda A Malley

Linda A. Malley, Ph.D., D.A.B.T.
Study Director
DuPont Haskell Laboratory for Health and Environmental Sciences

Cc.: L. Belcher
M. Kaplan
S. E. Loveless
E. Mylchreest